

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Dowling High School (69578103)
Date of Review: 1.7.2020 – 1.10.2020

Program Year: 2020
Month of Review: November
Lead Reviewer: Jean Easley
Org Representative(s):

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming	V-0300	November Claim does not match the November Edit Check Report from the point of service. It was learned that the point of service (POS) did not count a reimbursable meal if a student account was negative; so SFA had implemented a system to track meals purchased by students and these reimbursable meals were entered manually when account was paid. Reimbursable meals must be counted at the point of service to avoid systemic risk of counting error.	For your response, 1) describe how the point of service system has been changed to count all reimbursable meals at the POS, including students with a negative balance. 2) Modify the November and December Claims to reflect only reimbursable meals served at the point of service.	
1000 - Local School Wellness Policy	V-1000	At least every three years, the wellness policy and the goals of the wellness policy must be assessed and provided to the school community. The policy is posted on the parent portal; however, it has not been updated since March 2015. An assessment has not been completed nor made available to the public. Wellness Policy compliance is a repeat finding.	For your response, please indicate: 1) when the policy be updated and the assessment of goals will be completed (a date) 2) who will be involved in the process (names or titles) 3) where policy and assessment be posted or how it will be provided to community.	
RMCR - Indirect Costs	V-RMCR	The Nutrition Program was charged for Rent, Utilities (Electricity, Gas, Water) and a percentage of Maintenance and IT salaries by using a direct cost rate process. Technical Assistance reviewed USDA guidance to use an indirect cost method instead.	For your response, describe your understanding and plan for SY2019 -2020 to set up an Indirect Cost Allocation, or your intention to pay all costs from the general fund and not charge the nutrition fund.	

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Site - Level Findings: Dowling High School (8103)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	Hashbrown Potato Patty (2.5 oz) served at breakfast do not credit for a 1/2 cup serving as offered, therefore one meal was observed not to be reimbursable because it was the only fruit or vegetable selected. Manufacturer information did not give CN information, therefore, the Food Buying Guide was referenced which lists a 2.25 oz frozen shredded potato patty as crediting for 1/4 cup.	For your response, describe how the hashbrown patty will be offered on the breakfast menu moving forward.	
400 - Meal Components and Quantities - Lunch	V-0400	One meal was observed to be counted as reimbursable containing only one kiwi as the fruit and/or vegetable. One kiwi (33 - 39 ct) credits for 1/4 cup according to the Food Buying Guide, therefore the meal was not reimbursable.	For your response, state your understanding that one kiwi credits for 1/4 cup and how cashiers will be trained ensuring their understanding that selecting only this fruit will not ensure a reimbursable meal if not other fruit or vegetables are selected.	

Org - Level Technical Assistance

Area	Question	Comments
700 - Resource Management		<p>PROCUREMENT:</p> <p>Reminders about Solicitation documents:</p> <ul style="list-style-type: none"> · Maintain all history of solicitation documents – including all vendors sent and their responses. · Reminder to include the term “or equivalent” when referencing a brand in the solicitation document - not only in the contract. · Reference the Small Purchase Template for required Terms & Conditions in IowaCNP Download Forms. Terms and Conditions are still required even in an informal procurement.

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		<p>For upcoming Dairy Bid, remember to extend pricing. Reference spreadsheet document in Download Forms.</p> <ul style="list-style-type: none"> · Solicitation of beverages (or any item) sold by Nutrition must meet USDA procurement regulation regardless of who handles the contracts. <p>Include written justification - when appropriate - in selecting a vendor without other documentation. ie: SFA chose to purchase credit card transaction module from current POS instead of seeking three bids and a buy. Previous vendor had turnaround and other unacceptable issues and was costing nutrition program a lot of money with poor service so there was justification for this decision.</p>
700 - Resource Management		<p>BUY AMERICAN: SFA has started an exception log. Reminder to maintain this annually. State date, product accepted, reason why it was accepted ie: domestic was not available, or significantly higher prices than non domestic product.</p>
700 - Resource Management		<p>PROCUREMENT THRESHOLDS: Micro purchase threshold on Procurement Plan and Code of Conduct submitted with application for SY19-20, does not match the written Procurement Policy dated July 2016 submitted with the AR documents. The current USDA Micro Purchase Threshold is \$10,000 (not \$3,500). Please update Dowling's written Policy to reflect your correct local threshold.</p>
700 - Resource Management		<p>RENOVATING A KITCHEN: 2 CFR 200.452. Guidance can be found on page 16 in the Indirect Cost Guidance for State Agencies & School Food Authorities. Guidance was emailed to FSD and business manager.</p>
700 - Resource Management	712 Were indirect costs* charged to the SFA's nonprofit school food service account?	<p>INDIRECT COSTS: nutrition program was charged rent, a percentage of utilities, etc by using a direct cost rate process. Technical Assistance reviewed USDA guidance to use an indirect cost method instead. Provided Indirect Cost Flow Chart for non public schools from state agency. USDA Guidance on Indirect Costs; Appendix D: Typical Costs and their classification as Direct or Indirect provided.</p>

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Site - Level Technical Assistance Dowling High School (8103)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	401 Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?	OFFER versus SERVE: requirements for breakfast were explained and USDA sheets on OvS were provided as Technical Assistance. Cashiers were trained to look for three components on each breakfast tray instead of three items. The Breakfast Menu is being planned correctly and all breakfast meals observed during day of observation met reimbursable meal guidelines. Scenarios of possible reimbursable breakfasts were discussed.
400 - Meal Components and Quantities - Breakfast	409 Review production records and other supporting documentation.	VEGETABLES at BREAKFAST: production records are overall very complete. For vegetables offered during breakfast - hashbrowns, carrots, celery, bean salad, romaine salad - you need to include the planned serving sizes. Additionally, please include serving sizes for misc items: donut, sugar, ketchup, syrup, cream cheese, salad dressing. Numbers of servings are listed, but there are no serving sizes to reference.
400 - Meal Components and Quantities - Lunch	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	THAI CHICKEN is being served with a #10 scoop. Two samples from lines showed how portions could easily be slightly less than the 3.91 oz required to credit 2 M/MA per product formulation statement. Recommend checking the weight of serving size at the beginning of service so all servers strive to serve the full portion to all students.
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	STANDARDIZED RECIPES: strive to include meal pattern crediting on standardized recipes.

Org - Level Commendations

Description
BENEFIT DOCUMENTATION: free and reduced applications are correctly processed, I Caves documentation is attached to each application, E Look Up printouts are maintained. All documentation is well organized. Determining Official uses the E Look Up system twice monthly to ensure directly certified students receive benefits.
CIVIL RIGHTS: "And Justice for All" civil rights poster was posted in cafeteria, services are offered for Limited English Proficient households, annual civil rights training was provided food service staff and documented. The USDA and Iowa Non Discrimination Statements are including on documentation as required.
MENU and MEAL PATTERN: The Food Service Director, FSD, does a superior job of menu planning and offering choices. Many reimbursable combinations offered. Homemade blueberry muffins are one example of scratch items offered regularly.
NUTRITION DOCUMENTATION: director does an excellent job of maintaining CN labels, product formulation statements, smart snack printouts ensuring items served meet child nutrition guidelines. "Ingredient label" binders are available in the office which are promoted to students as a resource for special diets or interest in nutrition.

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PROCUREMENT: The SFA is a member of AEA Purchasing Group. Cost Reimbursable contract is being monitored ensuring discounts, credits, rebates are deposited to Nutrition Fund. A written Procurement Plan has been developed with includes federal and local thresholds. The SFA has a written Code of Conduct which includes conflicts of interests, accepting items of monetary value, disciplinary actions and checks and balances. Nutrition Director attended state agency procurement trainings and does an excellent job of keeping informed of USDA procurement regulation. IFBs and RFPs are advertised. Director maintains all documentation history of procurement events.

Thank you to the Food Service Director (FSD) for sending documentation prior to the onsite visit as this greatly expedited the Administrative Review (AR). The FSD was responsive to emails and quick to submit needed documentation and clarification.

USDA FOODS: SFA is on track to utilize entitlement funds or Paid Assistance Level (PAL).

VERIFICATION: was complete by Nov 15 at required; the correct number of applications were selected and verification was properly handled. Verification official maintained all documentation, the report was submitted in a timely manner, and participates with training.

Site - Level Commendations Dowling High School (8103)

Description
ENVIRONMENT: students are observed to have enough time to eat. Participation is excellent at breakfast and lunch. The SFA works hard to establish a scatter system and several Point of Service (POS) locations so there are limited lines. Signage is excellent identifying components so students can build a reimbursable meals.
HACCP/Food Safety: Daily temperature logs for the dishwasher, coolers, and food are maintained. There was a written HACCP plan with SOPs. Annual training is provided to staff. Good food safety procedures were observed. The latest health inspection report was publicly posted.
MEAL REQUIREMENTS and COMPONENTS: All meal components were available throughout meal service. Students can choose from a variety of entrees, fruits, and vegetables at breakfast and lunch. Standardized recipes are used. Production Records are maintained. Water was available. Offer versus Serve (OVS) was correctly implemented as required for high school. Temperature logs are maintained.
NUTRITION STAFF: all staff work very hard at ensuring students have enjoyable meals. Batch cooking is done so food is freshly prepared. All observed to be well trained in their jobs. All are friendly and helpful to student customers. Cashiers understand the meal pattern and recognize a reimbursable meal.